

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BENJAMIN CASE,

Plaintiff,

-against-

THE CITY OF NEW YORK, CHIEF OF DEPARTMENT
JOSEPH ESPOSITO, LIEUTENANT DAVID GROHT,
SERGEANT LAWRENCE PAPOLA, OFFICER
BENJAMIN ALMONTE, OFFICER DMITRY
TVERDOKHLEB, and OFFICER MICHAEL
MALDONADO,

**DECLARATION OF
HANNAH V. FADDIS IN
SUPPORT OF
DEFENDANTS' MOTIONS
*IN LIMINE***

19 Civ. 5995 (CM) (RWL)

Defendants.¹

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HANNAH V. FADDIS, an attorney duly admitted to practice in the Courts of New York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true:

1. I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (“City”), and the attorney assigned to represent defendants the City of New York, Esposito, and Maldonado. As such, I am familiar with the facts and circumstances stated herein and submit this declaration in support of Defendants’ Motions *In Limine*.

2. Annexed hereto as Exhibit “A” is a true and correct copy of plaintiff’s proposed trial exhibit 43.

¹ The parties have agreed that the caption should be amended, as follows: Mark Kushneir v. City of New York, Joseph Esposito, and Michael Maldonado.

Dated: New York, New York
April 27, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
*Attorney for City of New York, Esposito, and
Maldonado*
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By: 

Hannah V. Faddis
Senior Counsel

cc: VIA ECF
All Counsel of Record